

# TOWN of BROOKLINE

# Massachusetts

#### **BOARD OF SELECTMEN**

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333 WASHINGTON STREET BROOKLINE. MASSACHUSETTS 02445

(617) 730-2200 FAX: (617) 730-2054 www.BrooklineMA.gov

MELVIN A. KLECKNER Town Administrator

William F. Galvin Secretary of the Commonwealth Massachusetts Historical Commission 220 William T Morrissey Boulevard Boston, Mass. 02125

Re:

The Residences of South Brookline, Brookline, Massachusetts

Review to Determine Possible Adverse Effect

Dear Secretary Galvin:

On behalf of the Brookline Board of Selectmen, I am formally notifying the Massachusetts Historical Commission of a proposed project that impacts State and National Register properties, pursuant to 950 CMR 71.07(2)(d). The Residences of South Brookline is a proposed c.40B development to be located on the Brookline portion of the Hancock Village residential complex on Independence Drive in Brookline and Boston and abutting the Veterans of Foreign Wars (VFW) Parkway. The Town respectfully requests that the Massachusetts Historical Commission (MHC) review this proposal to determine if it meets the criteria defining adverse effect.

MassDevelopment deemed the project eligible under c.40B to receive tax-exempt bond financing in its October 8, 2013 Project Eligibility Letter. Subsequently, the Brookline Zoning Board of Appeals issued a Comprehensive Permit to the Applicant, The Residences of South Brookline, LLC, to construct 161 units on a portion of Hancock Village, a multi-jurisdictional 44-acre complex that is deemed eligible for listing in the National Register of Historic Places.

Because MassDevelopment will provide tax-exempt bond financing for this project, The Residences of South Brookline clearly falls under the jurisdiction of MHC. Although the Town recognizes that it is the responsibility of the state funding agency, MassDevelopment, to submit a Project Notification Form (PNF), the Town has not received notification that a PNF has been filed. The Board of Selectmen is therefore taking this action to ensure MHC is aware of this project and has the opportunity to recommend mitigation measures to protect the historical integrity of Hancock Village.

The Town maintains that at least one of the criteria of adverse effect applies to this proposed development:

"(a) the destruction or alteration of all or part of a State Register Property" (950 CMR 71.05)

## Historic Significance of Hancock Village Site

In 2012, MHC deemed Hancock Village eligible for listing in the National Register of Historic Places, a status that grants the property automatic listing in the State Register. A 44-acre, 800-unit complex straddling Boston and Brookline, Hancock Village is significant as a far-sighted collaboration between the Town of Brookline, the City of Boston and the Hancock Insurance Company to provide both employment and housing for returning World War II veterans.

Designed as a "garden village," the development consists of a series of two-story apartment houses arranged in distinct U-shaped patterns to allow for a hierarchical system of private and semi-private courtyards interspersed with open lawns and access roads. This development pattern is historically significant not only because it was designed by Olmsted Associates, a nationally renowned Brookline firm, but because it is based on the Garden City philosophy advocated in the first decades of the twentieth century by social reformer Ebenezer Howard, who called for the creation of new towns that were limited in size and density and surrounded by a ring or belt of undeveloped land. The objective of such developments was a planned community with affordable housing, low density, curving streets, separation of automobiles and pedestrians, shallow building plans to allow for light and ventilation and common spaces designed around the apartments forming a continuous park. A further objective was to preserve as much open space as possible and to respect the existing natural conditions and vegetation. A successful example of these applied principles, Hancock Village is the first and largest garden village housing development in Massachusetts.

### Project Description and Area of Impact

The pending project consists of sixty-two units of rental housing distributed in eleven buildings in the six-acre open-space green belt, which serves to buffer the abutting single-family neighborhood and Hancock Village. An additional ninety-nine units are to be located in a 500-foot long three- and predominantly four-story apartment building to be situated between two clusters of the U-shaped housing, thereby bisecting the distinctive development pattern that defines the historic Hancock Village complex. A project site plan is enclosed.

Furthermore, although existing buildings are not slated for demolition, the distinct development pattern of this historic property will indeed be impacted by the project. Specifically, the ring of open space designed to buffer this complex from the abutting single-family neighborhood and provide outdoor recreation for occupants of the complex will be eliminated. In addition, the two-acres of puddingstone outcroppings would site a 500-foot long mid-rise, which will obstruct the uninterrupted pedestrian access and sight lines that were the aim of the garden village layout. The siting of this project also sets a disturbing precedent for future development of the open-space corridors characteristic of this historically significant development pattern. Finally, it is important to note that Hancock Village abuts the Veterans of Foreign Wars (VFW) Parkway, which is listed in the National Register of Historic Places.

Because of the significance of this complex to the State's and arguably the nation's history, mitigation measures designed to reduce the impact of the pending project as well as any possible future development at Hancock Village are critical. Accordingly, the Town of Brookline respectfully requests that your office review the proposal prior to state funding to determine how adverse effects could be mitigated. Town staff is available to provide any information that may facilitate your review.

For your reference, the Town concurrently has requested an Advisory Opinion in its April 28, 2015 letter to Secretary of Energy and Environmental Affairs Matthew A. Beaton. At this time, we understand that the project proponent has not filed an Environmental Notification Form (ENF) to MEPA to prompt the agency's review, though the Town maintains that the project may indeed trigger a MEPA review under thresholds defined under Historical and Archaeological Resources.

The Board of Selectmen urges your favorable action in order to help the Town explore all possible mitigation measures that would help protect the historic integrity of Hancock Village. Thank you for your consideration.

Sincerery,

Neil Wishinsky

Chairman Board of Selectmen

Cc: Representative Edward Coppinger